

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20544**

In the Matter of)	
)	
Section 63.71 Application of)	WC Docket No. 19-235
Verizon Delaware LLC,)	
Verizon Maryland LLC,)	
Verizon New England Inc.,)	
Verizon New Jersey Inc.,)	
Verizon New York Inc.,)	
Verizon North LLC,)	
Verizon Pennsylvania LLC,)	
Verizon South Inc., and)	
Verizon Virginia LLC)	

VERIZON’S REPLY TO JOINT COMMENTS

The Verizon incumbent local exchange companies captioned above (collectively “Verizon”) file this reply to the joint comments filed by several parties who oppose or urge delay of our Section 63.71 Application.¹ The Commission should deny their request. The Application seeks authority to grandfather and discontinue in specific wire centers five outdated low-speed data and switching services that have largely been supplanted by more modern options.² They are not voice services, we have no residential retail customers buying these services, and neither our retail nor our wholesale customers use these services to provide plain old telephone service (“POTS”). These are services for which we have previously received authorization to

¹ See Comments of the Maryland Office of People’s Counsel, the New Jersey Division of Rate Counsel, the Public Utility Law Project of New York, Inc., and the Pennsylvania Office of Consumer Advocate, WC Docket No. 19-235 (Nov. 18, 2019) (“Joint Comments”).

² See Section 63.71 Application, WC Docket No. 19-235 (Aug. 14, 2019) (the “Application”). The services at issue are Voice Grade /Voiceband Service, WATS Access Line Service, Digital Data Service, DIGIPATH Digital Service II, and Feature Group A (also known as “PagePath”) (collectively “the Affected Services”). *Id.* at 3-5 (describing services). The specific locations are listed in the Application and comprise 646 wire centers in 9 states. *Id.* Ex. A.

grandfather and discontinue in more than two hundred other wire centers across the same states over the past several years, without any customer – retail or wholesale – objections. Demand for these services has declined significantly over time as most entities long ago switched to more modern services provided by Verizon or other providers. As described in our Application, customers have multiple alternative options to these services, including but not limited to fiber-based internet service, DS1, Private Internet Protocol Service, VoIP, Switched Ethernet, and LTE, and we work with our existing customers to transition them to alternative solutions.³ Moreover, customers affected by this Application will have more than a year from the date of filing – until August 31, 2020 – to identify and transition to another product before any service will be discontinued (and in many instances customers will have a much longer time period).

Given this decline in usage and the ready availability of a variety of alternatives, the public convenience and necessity will not be adversely affected by the grandfathering and discontinuance of the Affected Services in the wire centers covered by the Application. The commenters – perhaps mistakenly believing these to be residential or consumer voice services – seek additional information and delay of the approval process. Although none of the requested information is required by the Commission’s rules, we provide some additional information below, and we explain that there are no grounds for removing the Application from the Commission’s automatic-grant procedures. Accordingly, Verizon’s Application should be automatically granted on December 17, 2019, in accordance with the Commission’s Public Notice.⁴

³ See Application at 5 (listing potential alternative services and products).

⁴ See Public Notice, WC Docket No. 19-235 (Oct. 18, 2019).

A. Granting Verizon's Application Will Not Harm the Public Interest

Discontinuance of the Affected Services will not adversely affect the public convenience and necessity.⁵ These services are low-speed legacy data and switching services; they are not legacy voice services such as POTS or long distance. Our customers for these services are all either wholesale customers or non-residential retail customers – not mass-market consumers. As we've noted, demand for these services has declined significantly over time and continues to decline. For example, when we filed the Application, we had a total of approximately 306 retail and 28 wholesale customers remaining across the 646 wire centers.⁶ These counts have since declined to approximately 299 retail and 16 wholesale customers. The commenters seek additional detail at the wire center level for Maryland, New Jersey, New York, and Pennsylvania (collectively "the Four States").⁷ Although this level of detail is neither required by 47 C.F.R. § 63.71 nor typically included in providers' discontinuance applications,⁸ we have included the requested customer counts by wire center as Exhibit A. The data show that:

- across the 439 wire centers in the Four States covered by the Application, there are a total of 195 unique retail customers and 14 unique wholesale customers;
- across the 97 Maryland wire centers, there are 75 unique retail customers and 7 unique wholesale customers;

⁵ See 47 U.S.C. § 214(a) ("No carrier shall discontinue, reduce, or impair service to a community, or part of a community, unless and until there shall first have been obtained from the Commission a certificate that neither the present nor future public convenience and necessity will be adversely affected thereby . . .").

⁶ See Application at 1.

⁷ See Joint Comments at 3.

⁸ See, e.g., Verizon Section 63.71 Application, WC Docket No. 18-367 (Nov. 27, 2018); AT&T Section 63.71 Application, WC 18-300 (Sept. 24, 2018); Qwest d/b/a CenturyLink Section 63.71 Application, WC Docket No. 17-173 (June 16, 2017).

- across the 101 New Jersey wire centers, there are 68 unique retail customers and 7 unique wholesale customers;
- across the 115 New York wire centers, there are 37 unique retail customers and 9 unique wholesale customers; and
- across the 126 Pennsylvania wire centers, there are 41 unique retail customers and 9 unique wholesale customers.⁹

This more-detailed data confirms that the Affected Services are in low and declining demand in the areas in the Four States covered by the Application.

For those few customers in these locations that continue to purchase the Affected Services, Verizon's communications process provides ample notice of the discontinuance and multiple touch points. In compliance with the Commission's rules, we mailed an initial notice letter to all affected retail and wholesale customers on August 14, 2019 – the same day that we filed the Application with the Commission.¹⁰ This initial letter informed customers that we plan to grandfather the Affected Services on or after December 17, 2019, and that we plan to discontinue the services on or after August 31, 2020, subject to Commission approval.¹¹ Thus, customers will have more than a year's notice in which to transition to alternative offerings before any of their services are discontinued. The letter also identified potential alternative solutions offered by Verizon and encouraged customers to contact their Verizon account manager or Verizon customer service.

⁹ The sum of the individual state customer counts may exceed the aggregate count for the Four States because some customers have service in multiple states.

¹⁰ See Application at Ex. B. For retail customers, we send the letters referenced herein to both the billing and service addresses on file for each customer. For wholesale customers, we send the letters to the billing address on the account.

¹¹ The letter noted that “[m]odifications in service offerings for customers with existing contracts are subject to the terms of their contract or of the tariff.”

After we obtain Commission approval of our Application and the requested discontinuance date has passed, we plan to proceed with discontinuing the Affected Services in waves based on geographic areas. We proceed in waves because we cannot efficiently discontinue the Affected Services and provision replacement services on a single date across all of the locations covered by the Application. These waves can occur well after the requested August 31, 2020, date for beginning discontinuance of the Affected Services, and thus many customers will have far longer than a year before discontinuance of their service begins.

When we are ready to proceed with a service discontinuance wave, we send a letter to affected customers identifying their impacted circuit(s) and notifying them that the circuit(s) will be disconnected on a date approximately 120 days from the date of the letter. This “120-Day Letter” informs customers that they must place an order to transition or modify their service at least one week before the specified disconnect date in order to avoid disconnection of the circuit on that date. If the customer places a disconnect order, we will keep the circuit active for a maximum of 60 days after the specified disconnect date so that the customer has time to make arrangements for alternative solutions from Verizon or other providers. If the customer takes no action, the customer’s circuit(s) will be disconnected on or after the date specified in the 120-Day Letter. As with the initial notice letter, the 120-Day Letter specifies potential alternative solutions and encourages customers to contact their Verizon account manager. We also provide the phone number of our product withdrawal program manager and a dedicated email address for customers who have questions about the service withdrawal process.

After we send the 120-Day Letter, our teams also attempt to directly engage customers by phone to discuss the withdrawal process, the relevant deadlines for the customer to take action on the circuits at issue, and potential alternative solutions. The dedicated account teams for our

wholesale customers contact each customer directly to discuss our plans and alternative solutions for their service needs. For retail customers, if we have a phone number on file, we attempt to contact the customer on that number. If that attempt is unsuccessful, we'll review historical orders, repair tickets, or search the internet to try to identify an appropriate phone number. Of course, we will not directly contact the customers of our wholesale customers except as may be necessary to coordinate physical installation of new facilities for replacement services and will only do so with the wholesale provider's permission or as governed by relevant agreements.

Finally, if a customer has not placed a disconnect order, we plan to send a letter 45 days before the disconnect date specified in the 120-Day Letter. This "45-Day Letter" serves as a final written notice reminding the customer that it must place a disconnect order at least one week before the specified disconnect date in order to avoid service disconnection on that date.

We speak from experience when we say that this communications process ensures a smooth transition for customers as we discontinue the Affected Services. We have already filed for and received without objection the Commission's authorization to discontinue the Affected Services in 213 wire centers in our wireline footprint, including 5 wire centers in Maryland, 39 wire centers in New Jersey, 87 wire centers in New York, and 36 wire centers in Pennsylvania.¹²

¹² See Verizon Section 63.71 Application, WC Docket No. 18-367 (Nov. 27, 2018) (application to discontinue Feature Group A in 212 wire centers, including 5 in Maryland, 39 in New Jersey, 87 in New York, and 36 in Pennsylvania); Verizon Section 63.71 Application, WC Docket No. 18-65 (Feb. 26, 2018) (application to discontinue 4 of the Affected Services in 62 wire centers, including 14 in New Jersey, 12 in New York, and 23 in Pennsylvania); Verizon Section 63.71 Application, WC Docket No. 17-265 (Sept. 29, 2017) (application to discontinue 4 of the Affected Services in 49 wire centers, including 4 in Maryland, 16 in New Jersey, 7 in New York, and 7 in Pennsylvania); Verizon Section 63.71 Application, WC Docket No. 17-240 (Aug. 24, 2017) (application to discontinue 4 of the Affected Services in 63 New York wire centers); Verizon Section 63.71 Application, WC Docket No. 17-159 (June 1, 2017) (application to discontinue 4 of the Affected Services in 39 wire centers, including 1 in Maryland, 9 in New Jersey, 6 in New York, and 6 in Pennsylvania).

We are actively discontinuing the Affected Services in waves in 88 wire centers across our wireline footprint, including 2 wire centers in Maryland, 22 wire centers in New Jersey, 17 wire centers in New York, and 14 wire centers in Pennsylvania. We have completed discontinuing the Affected Services in 9 wire centers across our wireline footprint, including 1 wire center in New York. So far, a substantial plurality of our retail customers place a disconnect order and do not make arrangements for an alternative service because the customer no longer needs the Affected Service(s). About the same percentage of retail customers place a disconnect order and make arrangements for a replacement solution with Verizon. And a slightly smaller percentage of retail customers place a disconnect order and elect a non-Verizon alternative solution.¹³ This supports a conclusion that our process of discontinuing the Affected Services has been routine and smooth and that the public interest has not been adversely affected.

B. There Is No Need for the Additional Information Requested by the Commenters.

The information provided above and in our Application shows that there is no reason to delay Verizon's proposed effective dates. The Commission should reject the commenters' attempt to impose unnecessary and burdensome information requirements on the discontinuance process. Indeed, in recent years the Commission has been removing – not adding – burdens from the process.¹⁴ We've already addressed the request for more detailed customer counts by wire

¹³ We cannot provide similar statistics for wholesale customers because we do not have visibility into the reasoning behind our wholesale customers' and their end users' decisions.

¹⁴ See *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, Order and Decl. Ruling, 32 FCC Rcd 11,128, ¶¶ 80-155 (2017) (“2017 Order” or “2017 Declaratory Ruling”) (rules changes and declaratory ruling streamlining the Section 214(a) discontinuance process); *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, Second Rep. and Order, 33 FCC Rcd 5,660, ¶¶ 5-43 (2018) (rules changes further streamlining the Section 214(a) discontinuance process).

center. The commenters also ask the Commission to require Verizon to provide information about its plans to deploy fiber in the affected wire centers in the Four States.¹⁵ Verizon's notices of network changes, including copper retirement notices, are already available via the Commission's Electronic Comment Filing System and Verizon's network disclosures web page¹⁶ and describe our plans to deploy fiber in specific areas and locations.¹⁷

The commenters also ask the Commission to require Verizon to state "whether a functional equivalent exists in the affected wire centers."¹⁸ But the Commission has previously repealed its former "functional test" for determining whether a service discontinuance application is necessary. As the Commission noted, "carriers cannot know all of the myriad ways in which their services are used by customers, and it would be impracticable to require them to account for all these many uses."¹⁹ The same reasoning applies to the request here.

Although no wholesale customer has objected to the Application, the commenters seek information about "[t]he nature of the services provided by the wholesale customers," "[w]hether wholesale customers will be transitioned to fiber," and "[w]hether Verizon has discussed transition plans with the wholesale customers."²⁰ We do not monitor the services provided by our wholesale customers and therefore we cannot describe the nature of those services, although we note that discontinuance of the Affected Services will not affect consumers' ability to

¹⁵ See Joint Comments at 3.

¹⁶ See <https://www.verizon.com/about/terms-conditions/network-disclosures>.

¹⁷ See, e.g., Verizon Public Notice of Copper Retirement Under Rule 51.333, WC Docket No. 19-23 (Dec. 19, 2018) (stating that "Verizon has deployed or plans to deploy its fiber-to-the-premises network in these areas and intends to provide services over a fiber network infrastructure").

¹⁸ See Joint Comments at 3.

¹⁹ 2017 Declaratory Ruling ¶ 148.

²⁰ See Joint Comments at 3.

purchase POTS from Verizon. Regarding transition plans, our communications with wholesale customers provide ample notice of the discontinuance, explain the process, and identify potential alternative solutions – including potential fiber-based solutions. And, in light of our previous discontinuance filings for these same Affected Services, most, if not all, of our wholesale customers are familiar with our discontinuance procedures for these services.

Finally, the commenters incorrectly claim that Verizon failed to comply with Section 63.71(a)(6)’s requirement to provide certain information regarding line power and other topics.²¹ But the cited provisions apply only if a discontinuance application relates to a “technology transition,” which is defined in relevant part as involving discontinuance of a legacy TDM-based voice service.²² As explained above, the Affected Services are data or switching services, not voice services. Therefore, Section 63.71(a)(6) does not apply. Regardless, where we offer residential voice services over fiber, we make battery back-up options available.²³

C. Conclusion

For the reasons discussed above, Verizon’s Application should be automatically granted on December 17, 2019, as set out in the Public Notice. The Affected Services are outdated low-speed data or switching services that have relatively few customers, and Verizon has already

²¹ See Joint Comments at 4.

²² See 47 C.F.R. § 63.71(a)(6) (requiring additional information in notices to customers “[f]or applications to discontinue . . . an existing retail service as part of a technology transition, as defined in §63.60(i) . . .”); § 63.60(i) (“The term ‘technology transition’ means any change in service that would result in the replacement of a wireline TDM-based voice service with a service using a different technology or medium for transmission to the end user . . . ; except that retirement of copper . . . that does not result in a discontinuance . . . of service requiring Commission authorization pursuant to this part shall not constitute a ‘technology transition’ for purposes of this part.”).

²³ See *Ensuring Continuity of 911 Communications*, Order, 30 FCC Rcd 8,677, ¶ 3 (2015) (establishing “backup power obligations on providers of facilities-based fixed, residential voice services that are not line-powered”).

received without objection authority to discontinue these services in 213 wire centers, including wire centers in Maryland, New Jersey, New York, and Pennsylvania. As with the previous wire centers, discontinuing the Affected Services in the 646 Wire Centers covered by the current Application will not adversely affect the public convenience and necessity.

Respectfully submitted,

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State	Wire Center	Retail Customers	Wholesale Customers	Grand Total
MD Total	MD Total*	75	7	82
MD	Aberdeen	1	2	3
MD	Allentown	1		1
MD	Annapolis	1	2	3
MD	Arbutus	3	1	4
MD	Armiger	1	1	2
MD	BADEN			
MD	Baltimore - Dtn	6	5	11
MD	Bel Air	1	2	3
MD	Beltsville	3	1	4
MD	Berwyn	2	3	5
MD	Bowie		2	2
MD	Bradley	2	1	3
MD	Brandywine		1	1
MD	Brooklyn	3	2	5
MD	Brunswick		2	2
MD	BRYANS ROAD			
MD	Catonsville	2	1	3
MD	Central Avenue	7	1	8
MD	Chapel Hill		1	1
MD	Chase	1	1	2
MD	Chillum	2	2	4
MD	Church Road	1	1	2
MD	Clarksville	1	1	2
MD	Clinton	2		2
MD	Cockeysville	1	1	2
MD	Colesville	5	1	6
MD	Crofton	2	1	3
MD	Damascus		1	1
MD	Dorrs Corner		1	1
MD	Dundalk	2	1	3
MD	Edgewood	1	2	3
MD	Edmondson		1	1
MD	Elkridge	4	2	6
MD	Ellicott City	1	2	3
MD	Essex	1	1	2
MD	Fork	1		1
MD	Frankford		2	2
MD	Frederick	1	3	4
MD	Friendship	2	2	4
MD	Gaithersburg	13	3	16
MD	GALESVILLE			
MD	Germantown	1	2	3
MD	Glenwood	1	2	3
MD	Hagerstown	2	2	4

State	Wire Center	Retail Customers	Wholesale Customers	Grand Total
MD	Hamilton	2		2
MD	Havre De Grace	1	3	4
MD	Hunt Valley	2	1	3
MD	Hyattsville	1	3	4
MD	Indian Head		1	1
MD	Jarrettsville	1	1	2
MD	Landover	4	2	6
MD	Lanham	6	2	8
MD	Laplata	1	2	3
MD	Laurel	6	4	10
MD	Lexington Park		3	3
MD	Liberty	1	1	2
MD	Madison		2	2
MD	Manor		1	1
MD	Marlboro		1	1
MD	MAYO			
MD	Montrose	3	2	5
MD	Mt Airy	1	2	3
MD	Muirkirk	9		9
MD	Norbeck		1	1
MD	NORTH POINT			
MD	Northwood	1		1
MD	Oakdale		1	1
MD	Odenton		3	3
MD	Owen Brown	1		1
MD	Owings Mills	3	2	5
MD	Oxon Hill	2	2	4
MD	Parkville	1		1
MD	Parkway	3	2	5
MD	Parole	3	1	4
MD	Perry Hall	2		2
MD	Pikesville	2	2	4
MD	Piney Orchard	2		2
MD	Poolesville		1	1
MD	Randallstown	1		1
MD	Reisterstown		2	2
MD	Riggs	2	1	3
MD	Severna Park	1		1
MD	Silver Spring	2	3	5
MD	Snowden River		2	2
MD	St Margarets		1	1
MD	Suitland	5	2	7
MD	Temple Hills	4	2	6
MD	University	1	1	2
MD	Waldorf	1	2	3

State	Wire Center	Retail Customers	Wholesale Customers	Grand Total
MD	Wheaton		1	1
MD	White Marsh		1	1
MD	Wildwood	2	2	4
MD	WINTERS RUN			
MD	Wolfe	1	2	3
MD	Wood Acres	2	1	3
MD	Woodlawn	4	3	7
MD	York Road	1	1	2

State	Wire Center	Retail Customers	Wholesale Customers	Grand Total
NJ Total	NJ Total*	68	7	75
NJ	Allentown	1	1	2
NJ	Atlantic Highlands	1		1
NJ	AVALON			
NJ	Bayonne	2	2	4
NJ	Bedminster		2	2
NJ	BELLEVILLE			
NJ	Bernardsville		1	1
NJ	Boonton		2	2
NJ	BORDENTOWN			
NJ	Bridgeton		2	2
NJ	BROWNS MILLS			
NJ	Caldwell	1	1	2
NJ	Camden	2	1	3
NJ	Cherry Hill		1	1
NJ	Cliffside Park	2	1	3
NJ	Clifton		1	1
NJ	Closter	1	3	4
NJ	Dover	2	1	3
NJ	Dumont		1	1
NJ	Eatontown		4	4
NJ	Edison		2	2
NJ	EGG HARBOR			
NJ	Elizabeth	3	2	5
NJ	ENGLISHTOWN			
NJ	Fair Lawn	1		1
NJ	Fairfield	1	2	3
NJ	Fort Dix		3	3
NJ	Franklin Park		1	1
NJ	Gloucester	1		1
NJ	Haledon	1	2	3
NJ	Hammonton	1	2	3
NJ	Hightstown	1	2	3
NJ	Holmdel		2	2
NJ	Hopewell	2	1	3
NJ	Humboldt		2	2
NJ	Ironbound	4	2	6
NJ	JAMESBURG			
NJ	KEANSBURG			
NJ	Kearny		1	1
NJ	Lakehurst		1	1
NJ	Lakewood	1	1	2
NJ	Little Falls		2	2
NJ	Little Ferry	2	2	4
NJ	LONG BRANCH			

State	Wire Center	Retail Customers	Wholesale Customers	Grand Total
NJ	Madison		2	2
NJ	Market Newark	13	4	17
NJ	MENDHAM			
NJ	Mercerville	1	3	4
NJ	Middletown		2	2
NJ	Millburn	2	2	4
NJ	Millington		1	1
NJ	Monmouth Junction		1	1
NJ	Moorestown	6	2	8
NJ	Mount Holly	3	2	5
NJ	Murray Hill		2	2
NJ	Neptune		1	1
NJ	NEW EGYPT			
NJ	North Bergen	3	2	5
NJ	Nutley		2	2
NJ	Oakland		1	1
NJ	Oradell	2	1	3
NJ	Passaic	3	2	5
NJ	Paterson	1	2	3
NJ	PEMBERTON			
NJ	Penns Neck	3	3	6
NJ	Plainfield		2	2
NJ	Pleasantville	3	2	5
NJ	POINT PLEASANT			
NJ	Pompton Lakes	1		1
NJ	Princeton	3	4	7
NJ	Prospect Plains		2	2
NJ	Rahway	4	2	6
NJ	Ramsey	2	2	4
NJ	ROCHELLE PARK	4	3	7
NJ	Rockaway	1		1
NJ	Rutherford	10	3	13
NJ	Seaside Park		1	1
NJ	South Amboy		1	1
NJ	South Orange	1	1	2
NJ	SPOTSWOOD			
NJ	SPRING LAKE			
NJ	Succasunna		1	1
NJ	Summit		1	1
NJ	SWEDESBORO			
NJ	Trenton	3	2	5
NJ	Unionville	1	2	3
NJ	VAN HISEVILLE			
NJ	Villas		1	1
NJ	VINCENTOWN			

State	Wire Center	Retail Customers	Wholesale Customers	Grand Total
NJ	Vineland		3	3
NJ	Waverly	1		1
NJ	West Orange	2	2	4
NJ	WEST OSBORNVILLE			
NJ	Westfield		3	3
NJ	Westwood	1	2	3
NJ	Whippany		2	2
NJ	White Horse		1	1
NJ	Williamstown		1	1
NJ	Willingboro		1	1
NJ	Woodbridge	3	2	5
NJ	Wyckoff		1	1

State	Wire Center	Retail Customers	Wholesale Customers	Grand Total
NY Total	NY Total*	37	9	46
NY	Albany State Street	5	3	8
NY	Albany Wash Ave	3	3	6
NY	ALTAMONT			
NY	Amherst	4	1	5
NY	Armonk	1	3	4
NY	Auburn	1	2	3
NY	BABYLON		1	1
NY	Baldwinsville	2	1	3
NY	Ballston Spa	2		2
NY	Beacon	1	1	2
NY	BEDFORD VILLAGE			
NY	Brewster	1	1	2
NY	BRIDGEPORT	1	1	2
NY	Buffalo Main	4	2	6
NY	CAMILLUS	1	1	2
NY	Carmel		2	2
NY	Chappaqua		1	1
NY	Cicero	2		2
NY	Clarence Center	1	1	2
NY	Clay	2		2
NY	Clifton Park	1	1	2
NY	Commack	1		1
NY	Croton On Hudson		1	1
NY	Delmar	1	2	3
NY	Dobbs Ferry		3	3
NY	EAST FIRE ISLAND			
NY	Fairmont	1	1	2
NY	Fayetteville	1		1
NY	Fishkill East	1	1	2
NY	Floral Park	1	2	3
NY	Franklin Woodmere	2	1	3
NY	Garden City/Mid-Nass	6	2	8
NY	Glen Cove	1	1	2
NY	Great Neck		3	3
NY	Guilderland	2	2	4
NY	Hamburg		1	1
NY	Harrison	1	3	4
NY	Hertel	3	1	4
NY	Hicksville		3	3
NY	Hollow Brook		1	1
NY	Huntington	1	2	3
NY	Ithaca Pleasant Grove		3	3
NY	Ithaca Tioga Street		3	3
NY	Jordan	1	1	2

State	Wire Center	Retail Customers	Wholesale Customers	Grand Total
NY	Katonah		1	1
NY	Lancaster	2	2	4
NY	Larchmont		1	1
NY	Latham	1	2	3
NY	LEVITTOWN			
NY	Mamaroneck		2	2
NY	Manhasset		2	2
NY	Marlboro	1	1	2
NY	Mechanicville	1	1	2
NY	Minoa	1	1	2
NY	Mount Kisco		1	1
NY	New City	1	1	2
NY	New Windsor	1	2	3
NY	Newburg Liberty Main	1	2	3
NY	Newburgh West	1	1	2
NY	North Syracuse	2	1	3
NY	Nyack		1	1
NY	Orangeburg	2	1	3
NY	Ossining		3	3
NY	OWASCO			
NY	Oyster Bay	1		1
NY	Patchogue	1	2	3
NY	Patterson		2	2
NY	Pearl River	1	2	3
NY	Peekskill	1	3	4
NY	Pleasantville	1	4	5
NY	Pomona	2	2	4
NY	Port Chester		3	3
NY	Port Jefferson		1	1
NY	Port Washington		1	1
NY	Poughk Spackenkill	1	2	3
NY	Poughkeepsie Hamilton	1	2	3
NY	Purdys	1	1	2
NY	Ronkonkoma	1	3	4
NY	Roslyn		2	2
NY	Rye	1	3	4
NY	Saratoga	2	1	3
NY	Sayville	1	2	3
NY	Scarsdale	2	2	4
NY	Schenec Clinton St	3	4	7
NY	Schenec Curry Road	4	2	6
NY	Setauket		2	2
NY	Sloatsburg	1	2	3
NY	Smithtown		1	1
NY	South Bethlehem		2	2

State	Wire Center	Retail Customers	Wholesale Customers	Grand Total
NY	South Park	4	2	6
NY	South Salem	1		1
NY	Spring Valley	2	3	5
NY	Suffern	2	1	3
NY	Syosset	1	1	2
NY	Syr - Dippold Ave	2	2	4
NY	Syr - Electric Parkway	3	2	5
NY	Syr - James Street	2	2	4
NY	Syr - South Salina	1	2	3
NY	Syr - State Street	8	2	10
NY	SYRACUSE EAST GENESEE			
NY	Tarrytown		3	3
NY	Tonawanda	2	2	4
NY	Troy 3rd Street	1	1	2
NY	Troy 4th Street	3		3
NY	Tuckahoe		2	2
NY	Voorheesville	2	1	3
NY	Wanakah		1	1
NY	Wantagh		1	1
NY	Wappinger Falls	2	1	3
NY	West Haverstraw	3	2	5
NY	West Seneca French		1	1
NY	Westbury	2	1	3
NY	Yaphank	1	2	3
NY	Yonkers	1	4	5
NY	Yorktown		2	2

State	Wire Center	Retail Customers	Wholesale Customers	Grand Total
PA Total	PA Total*	41	9	50
PA	Allentown (Lehigh)	1	2	3
PA	Ambridge		2	2
PA	Ardmore		1	1
PA	AVONDALE			
PA	Bala Cynwyd	1	2	3
PA	Bedminster			
PA	Bellevue		1	1
PA	Bethayres	1		1
PA	Bethlehem		2	2
PA	Braddock		1	1
PA	Bridgeville	1	2	3
PA	Bristol	1	1	2
PA	Bryn Mawr	1	2	3
PA	Buckingham	1		1
PA	CANONSBURG			
PA	Carrick (Pitt)		1	1
PA	CARVERSVILLE			
PA	Center Point	1		1
PA	Chester A	1	1	2
PA	Chester B	1	1	2
PA	Chester Heights	1	2	3
PA	Chester Springs		1	1
PA	CHESTNUT HILL	1	1	2
PA	Churchville		2	2
PA	Clairton		1	1
PA	Coatesville	3	2	5
PA	Collegeville	1	1	2
PA	Coraopolis	3	2	5
PA	Crafton (Pitt)		2	2
PA	Davenport		1	1
PA	Dillsburg		1	1
PA	Donora		1	1
PA	Dorseyville	1		1
PA	Dover			
PA	Downingtown		1	1
PA	Downtown Pittsburg	2	2	4
PA	Eagle	2	1	3
PA	Eastwick	7	2	9
PA	Elizabeth		2	2
PA	ELIZABETH TOWNSHIP			
PA	Evergreen	5	3	8
PA	Exton	2	1	3
PA	FINLEYVILLE			
PA	Fishing Creek		1	1

State	Wire Center	Retail Customers	Wholesale Customers	Grand Total
PA	GLENMORE			
PA	GLENSHAW			
PA	GREEN LANE			
PA	Harleysville		1	1
PA	Harrisburg		2	2
PA	Hatboro	2	2	4
PA	Hershey		1	1
PA	Homestead		1	1
PA	Imperial		1	1
PA	Kemblesville	1		1
PA	Kennett Square	1	2	3
PA	King Of Prussia	2	2	4
PA	Kuhnsville		2	2
PA	LANDENBERG			
PA	Langhorne		1	1
PA	Larchmont		2	2
PA	Lebanon		1	1
PA	Locust	6	4	10
PA	Market	7	3	10
PA	Mcdonald		1	1
PA	McKees Rocks (Pitt)	1	2	3
PA	Mckeesport		1	1
PA	MCMURRAY			
PA	Media	2	2	4
PA	Mendenhall		1	1
PA	Millvale		2	2
PA	Monroeville		2	2
PA	Morrisville	2	1	3
PA	Mountainville	2	2	4
PA	New Cumberland	1	1	2
PA	New Hope	1		1
PA	Newtown	1	1	2
PA	Norristown	3	2	5
PA	North Side	1	2	3
PA	NORTH WALES			
PA	Oakdale		1	1
PA	OAKMONT			
PA	OXFORD			
PA	PALMYRA			
PA	Paoli	1	3	4
PA	Parkerford	2	1	3

State	Wire Center	Retail Customers	Wholesale Customers	Grand Total
PA	Parkesburg	1	2	3
PA	Paxtang		2	2
PA	Penn Hills		1	1
PA	Pennsburg	1		1
PA	Pennypacker	2	4	6
PA	Perkasie		1	1
PA	Perrysville	1	1	2
PA	Phoenixville	1		1
PA	PINEVILLE			
PA	Pleasant Hills		1	1
PA	Plumsteadville	1		1
PA	Pughtown	1		1
PA	Quakertown		1	1
PA	Regent		2	2
PA	Ridley Park	2	2	4
PA	Robinson Twp		3	3
PA	Royersford	1	1	2
PA	Saratoga	1	1	2
PA	Schwenksville	1		1
PA	Sewickley	2		2
PA	Sharpsburg		1	1
PA	Shellsville		1	1
PA	SHERWOOD			
PA	SOUDERTON			
PA	Springfield	2	2	4
PA	Squirrel Hill		1	1
PA	Trinity		1	1
PA	Trooper	1	2	3
PA	WARRINGTON			
PA	Washington	2	2	4
PA	Waverly	2	1	3
PA	Wayne	1	2	3
PA	West Chester	2	2	4
PA	West Grove	2	1	3

State	Wire Center	Retail Customers	Wholesale Customers	Grand Total
PA	West Mifflin	1	2	3
PA	West Newton		1	1
PA	West View (Pitt)	1	2	3
PA	Willow Grove		2	2
PA	Yardley	1	1	2
PA	York Main		3	3
PA	YORK NORTH			
MD, NJ, NY, PA	Grand Total (MD, NJ, NY, PA)*	195	14	209

* The sum of the individual wire center customer counts in a state may exceed the aggregate customer counts for that state because some customers have service in multiple wire centers in a state. Similarly, the sum of the aggregate customer counts for the individual states may exceed the aggregate customer counts across all four states because some customers have service in multiple states.